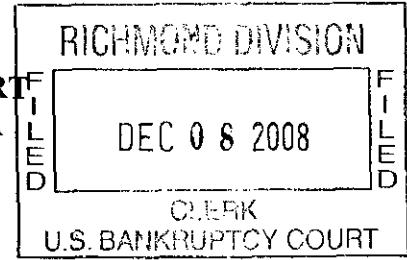


IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION



In re:

Chapter 11

**CIRCUIT CITY STORES, INC.,  
et al.**

**Case No. 08-35653**

**Jointly Administered**

Debtors.

**SUPPLEMENTAL REQUEST FOR ADEQUATE ASSURANCE IN ADDITION  
TO THE RIGHTS PREVIOUSLY REQUESTED ON BEHALF OF KNOXVILLE  
UTILITIES BOARD**

In support of the supplemental request of Knoxville Utilities Board ("KUB") says as follows:

1. KUB previously submitted a Request for Adequate Assurance, Request for Additional Assurance and Objection to Debtor's Proposed Adequate Assurance on November 25, 2008. KUB incorporates the previous request as submitted.

2. Circuit City Stores are located at the following addresses: 151 North Peters Road, Knoxville, TN 37923; 4627 Greenway Drive, Knoxville, TN 37918; and, 2936 Knoxville Center Drive, Knoxville, TN 37924.

3. KUB seeks two times the highest average monthly bill as an appropriate adequate assurance deposit, which may be done by bond or by cash payment. The necessity for this deposit is that utility services will be provided and used prior to notice of a failure to pay for the utilities or prior to termination of the utility service. Thus, the cycle would continue to allow the debtor to use at least, if not more, than sixty (60) day's worth of utilities.

4. There are five utility accounts for Circuit City and they are as follows:

<u>Account No.</u>	<u>Highest Mo. Amt.</u>	<u>2x High</u>
1723300000	\$ 122.36	\$ 244.00
3297451701	\$ 7,581.55	\$ 15,200.00
3723300000	\$ 4,600.00	\$ 9,200.00
2723300000	\$ 21.68	\$ 44.00
4723300000	\$ 6,158.23	<u>\$ 12,400.00</u>
		\$ 37,088.00

The total deposit requested is \$37,088.00. Copies of the payment screens and account history are attached as Exhibit A. Notice to the undersigned can be given at the following address and e-mail concerning receipt of adequate assurance:

Dean B. Farmer, Esq.  
Hodges, Doughty & Carson, PLLC  
617 Main Street  
Knoxville, Tennessee 37901  
[dfarmer@hdclaw.com](mailto:dfarmer@hdclaw.com)

Respectfully submitted this 2nd day of December, 2008.

Dean B. Farmer *By Kandi R. Yager  
w/ permission*  
Dean B. Farmer, Esq. (BPR # 006851)  
Hodges, Doughty & Carson  
617 Main Street  
Knoxville, Tennessee 37901  
**Attorney for Knoxville Utilities Board**

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing pleading has been forwarded to the following persons, by placing same in the U.S. Mail, postage prepaid, on this the 2nd day of December, 2008:

Sarah B. Boehm, Esq.  
McGuireWoods LLP  
One James Center  
901 East Cary Street  
Richmond, VA 23219-4030

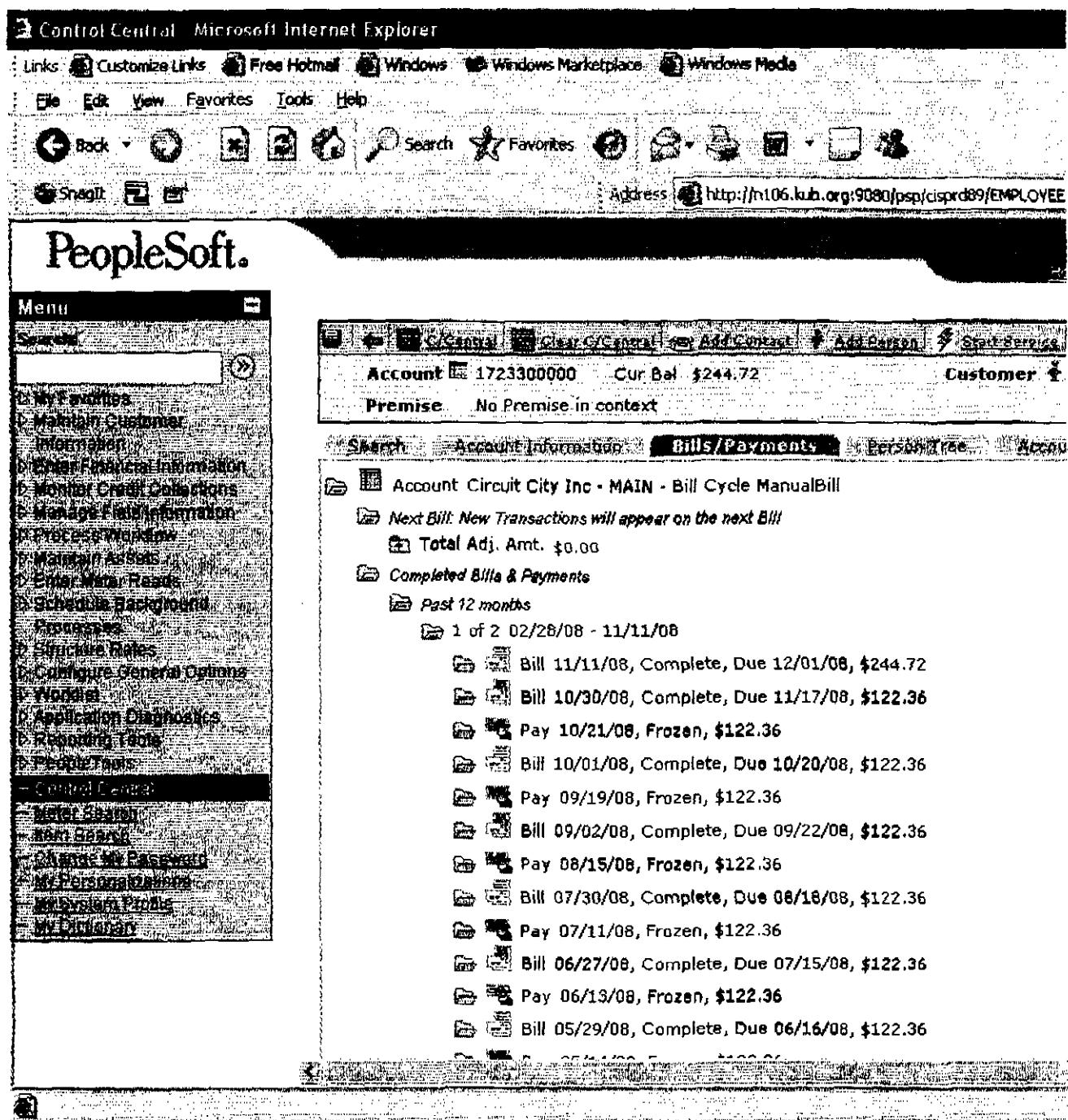
Circuit City Stores, Inc.  
Reggie Hedgebeth  
Daniel Ramsey  
9960 Mayland Drive  
Richmond, VA 23233

Ian S. Fredericks, Esq.  
Skadden, Arps, Slate, Meagher  
& Flom, LLP  
One Rodney Square  
P.O. Box 636  
Wilmington, DE 19899-0636

David S. Berman, Esq.  
Riener & Braunstein LLP  
Three Center Plaza, 6th Floor  
Boston, MA 02108

Sara K. Baker, Esq.  
Skadden, Arps, Slate, Meagher  
& Flom, LLP  
333 West Wacker Drive  
Chicago, IL 60606

*by*  
Dean B. Farmer Kandi Ryals  
Dean B. Farmer W/ permission



**EXHIBIT**

Tables

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# PeopleSoft.

Menu

Search

Account 3297451701 Cur Bal \$8,363.45 Customer

Premise - No Premise in context

Search Account Information Bills / Payments Person Free Approv

Account Circuit City Inc - MAIN - Bill Cycle Manual Bill

Next Bill: New Transactions will appear on the next Bill

Total Adj. Amt. \$0.00

Completed Bills & Payments

Past 12 months

1 of 2 03/21/08 - 11/13/08

Bill 11/13/08, Complete, Due 12/01/08, \$8,363.45

Bill 11/05/08, Complete, Due 11/24/08, \$6,820.10

Pay 10/22/08, Frozen, \$5,875.26

Bill 10/06/08, Complete, Due 10/24/08, \$5,875.26

Pay 09/24/08, Frozen, \$24.60

Pay 09/24/08, Frozen, \$7,581.55

Bill 09/08/08, Complete, Due 09/26/08, \$7,606.15

Pay 08/22/08, Frozen, \$6,836.45

Bill 08/05/08, Complete, Due 08/25/08, \$6,836.45

Pay 07/18/08, Frozen, \$5,821.15

Bill 07/02/08, Complete, Due 07/21/08, \$5,821.15

Pay 06/25/08, Frozen, \$6,483.67

Bill 06/09/08, Complete, Due 06/27/08, \$6,483.67

Print Email Refresh #5 100% 74

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Snapshot Address: <http://n106.kub.org:9080/psp/cispr09/EMPLOYEE>

# PeopleSoft.

Menu

- My Favorites
- Manage Customer Information
- Enter Financial Information
- Monitor Credit Collections
- Manage Field Information
- Process Workflows
- Review Events
- Enter Sales Items
- Customer Background
- Processes
- Executive Reports
- Corporate General Options
- Normal
- Administrative Functions
- Reporting Tools
- Financials
- General Ledger
- New Session
- Change My Password
- My Account Options
- My Session Profile
- My Enrollment

Account: 3723300000 Cur Bal: \$4,421.83 Customer:

Premise: No Premise in context

Search Account Information Bills/Payments Person/Group Account

Account: Circuit City Inc - MAIN - Bill Cycle Manual Bill

Next Bill: New Transactions will appear on the next Bill

Total Adj. Amt. \$0.00

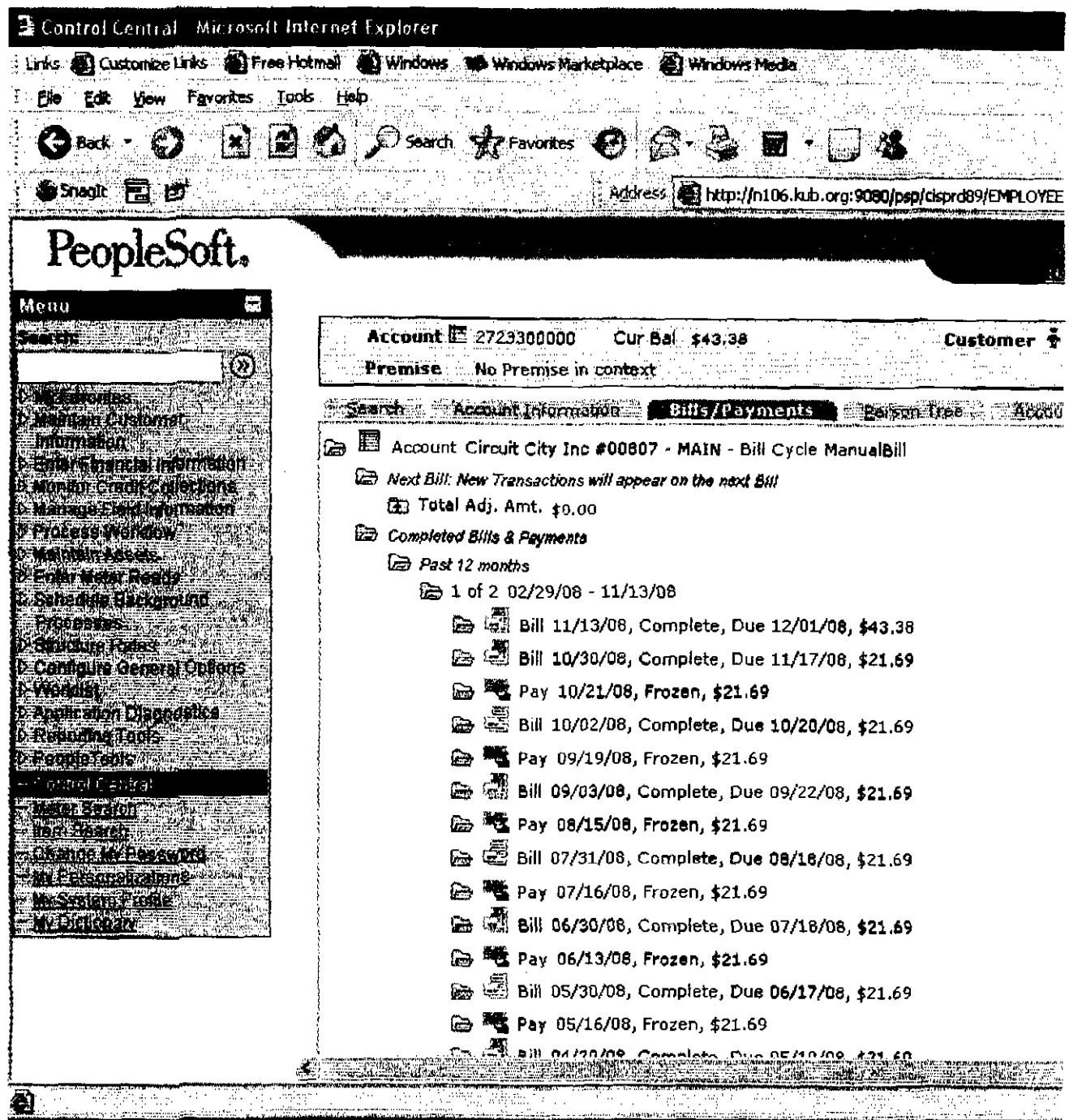
Completed Bills & Payments

Past 12 months

1 of 2 02/29/08 - 11/13/08

- Bill 11/13/08, Complete, Due 12/01/08, \$4,421.83
- Bill 10/31/08, Complete, Due 11/18/08, \$2,900.89
- Pay 10/21/08, Frozen, \$3,411.24
- Bill 10/01/08, Complete, Due 10/20/08, \$3,411.24
- Pay 09/19/08, Frozen, \$3,690.19
- Bill 09/03/08, Complete, Due 09/22/08, \$3,690.19
- Pay 08/15/08, Frozen, \$3,594.05
- Bill 07/31/08, Complete, Due 08/18/08, \$3,594.05
- Pay 07/16/08, Frozen, \$3,398.28
- Bill 06/30/08, Complete, Due 07/18/08, \$3,398.28
- Pay 06/13/08, Frozen, \$2,736.90
- Bill 05/30/08, Complete, Due 06/17/08, \$2,736.90
- Pay 05/16/08, Frozen, \$2,660.79
- Bill 04/29/08, Complete, Due 05/19/08, \$2,660.79







Case 08-35653-KRH Doc 808 Filed 12/08/08 Entered 12/09/08 12:48:42 Desc Main

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**PeopleSoft.**

Menu

Search  Account Information  Bills/Payments  Person Tree  Account Tree  Premise Tree

Account **4723300000** Cur Bal **\$4,593.00** Customer **Circuit City Inc #00815**

Premise **No Premise in context**

**151 PETERS RD (E, G)**

Account Circuit City Inc #00815 - MAIN - Bill Cycle Manual Bill

Next Bill: New Transactions will appear on the next Bill

Total Adj. Amt. \$0.00

Completed Bills & Payments

Past 12 months

1 of 2 03/04/08 - 11/13/08

Bill 11/13/08, Complete, Due 12/01/08, \$4,593.00

Pay 10/31/08, Frozen, \$5,367.41

Bill 10/17/08, Complete, Due 11/04/08, \$5,367.41

Pay 10/09/08, Frozen, \$5,812.49

Bill 09/19/08, Complete, Due 10/07/08, \$5,812.49

Pay 09/05/08, Frozen, \$6,158.23

Bill 08/19/08, Complete, Due 09/08/08, \$6,158.23

Pay 08/01/08, Frozen, \$5,862.39

Bill 07/16/08, Complete, Due 08/05/08, \$5,862.39

Pay 07/03/08, Frozen, \$5,831.96

Bill 06/17/08, Complete, Due 07/07/08, \$5,831.96

Pay 05/30/08, Frozen, \$4,579.57

Bill 05/15/08, Complete, Due 06/02/08, \$4,579.57

Pay 05/02/08, Frozen, \$4,504.29

Bill 04/16/08, Complete, Due 05/05/08, \$4,504.29

Pay 04/04/08, Frozen, \$4,942.48

Bill 03/18/08, Complete, Due 04/07/08, \$4,942.48

Pay 03/04/08, Frozen, \$5,413.28

2 of 2 12/18/07 - 02/18/08

Bill 02/18/08, Complete, Due 03/07/08, \$5,413.28

Pay 02/01/08, Frozen, \$5,294.42

Bill 01/18/08, Complete, Due 02/05/08, \$5,294.42

Pay 01/04/08, Frozen, \$4,919.91

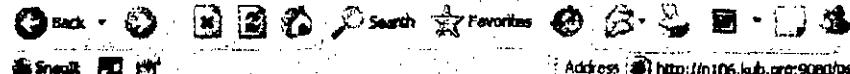
Bill 12/18/07, Complete, Due 01/07/08, \$4,919.91

Past 12 - 24 months

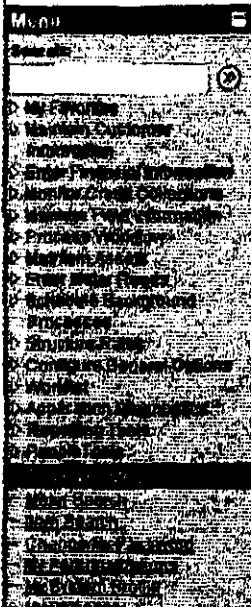
Older than 24 months

Related Links

start  F  Local Intranet



# PeopleSoft.



Account	2723300000 Cur Bal \$43.38	Customer	Circuit City Inc #00007
Premise	No Premise in context		
Search	Account Information	Bills / Payments	Person Type
<input checked="" type="checkbox"/> Account Circuit City Inc #00007 - MAIN - Bill Cycle Menu Bill <input type="checkbox"/> Next Bill: New Transactions will appear on the next Bill <input type="checkbox"/> Total Adj. Amt. \$0.00 <input type="checkbox"/> Completed Bills & Payments <input type="checkbox"/> Past 12 months 1 of 2 02/29/08 - 11/13/08 <input type="checkbox"/> Bill 11/13/08, Complete, Due 12/01/08, \$43.38 <input type="checkbox"/> Bill 10/30/08, Complete, Due 11/17/08, \$21.69 <input type="checkbox"/> Pay 10/21/08, Frozen, \$21.69 <input type="checkbox"/> Bill 10/02/08, Complete, Due 10/20/08, \$21.69 <input type="checkbox"/> Pay 09/19/08, Frozen, \$21.69 <input type="checkbox"/> Bill 09/03/08, Complete, Due 09/22/08, \$21.69 <input type="checkbox"/> Pay 08/15/08, Frozen, \$21.69 <input type="checkbox"/> Bill 07/31/08, Complete, Due 08/18/08, \$21.69 <input type="checkbox"/> Pay 07/16/08, Frozen, \$21.69 <input type="checkbox"/> Bill 06/30/08, Complete, Due 07/18/08, \$21.69 <input type="checkbox"/> Pay 06/13/08, Frozen, \$21.69 <input type="checkbox"/> Bill 05/30/08, Complete, Due 06/17/08, \$21.69 <input type="checkbox"/> Pay 05/16/08, Frozen, \$21.69 <input type="checkbox"/> Bill 04/29/08, Complete, Due 05/19/08, \$21.69 <input type="checkbox"/> Pay 04/16/08, Frozen, \$21.69 <input type="checkbox"/> Bill 03/31/08, Complete, Due 04/18/08, \$21.69 <input type="checkbox"/> Pay 03/14/08, Frozen, \$21.69 <input type="checkbox"/> Bill 02/29/08, Complete, Due 03/18/08, \$21.69  2 of 2 12/03/07 - 02/15/08 <input type="checkbox"/> Pay 02/15/08, Frozen, \$21.69 <input type="checkbox"/> Bill 01/31/08, Complete, Due 02/18/08, \$21.69 <input type="checkbox"/> Pay 01/18/08, Frozen, \$21.69 <input type="checkbox"/> Bill 01/03/08, Complete, Due 01/22/08, \$21.69 <input type="checkbox"/> Pay 12/18/07, Frozen, \$21.69 <input type="checkbox"/> Bill 12/03/07, Complete, Due 12/21/07, \$21.69  <input type="checkbox"/> Past 12 - 24 months <input type="checkbox"/> Older than 24 months			

2936 KNOXVILLE CENTER DR.

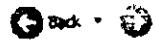
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Related Links

Local Internet

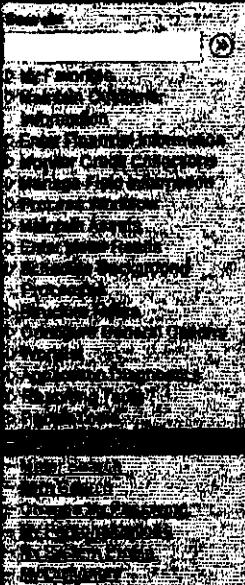
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Search  FavoritesAddress  Go

# PeopleSoft.

Menu



Account # 9723300000 Cur Bal. \$4,421.88 Customer # Circuit City Inc

Premise No Premise in context

Search  Account Information  Bills / Payments  Payment Tree  Account Tree  Premise Tree

Account Circuit City Inc - MAIN - Bill Cycle Manual Bill

Next Bill: New Transactions will appear on the next Bill

Total Adj. Amt. \$0.00

Completed Bills & Payments

Past 12 months

1 of 2 02/29/08 - 11/13/08

Bill 11/13/08, Complete, Due 12/01/08, \$4,421.88

Bill 10/31/08, Complete, Due 11/18/08, \$2,900.89

Pay 10/21/08, Frozen, \$3,411.24

Bill 10/01/08, Complete, Due 10/20/08, \$3,411.24

Pay 09/19/08, Frozen, \$3,690.19

Bill 09/03/08, Complete, Due 09/22/08, \$3,690.19

Pay 08/15/08, Frozen, \$3,594.05

Bill 07/31/08, Complete, Due 08/16/08, \$3,594.05

Pay 07/16/08, Frozen, \$3,398.28

Bill 06/30/08, Complete, Due 07/16/08, \$3,398.28

Pay 06/13/08, Frozen, \$2,736.90

Bill 05/30/08, Complete, Due 06/17/08, \$2,736.90

Pay 05/16/08, Frozen, \$2,660.79

Bill 04/29/08, Complete, Due 05/19/08, \$2,660.79

Pay 04/16/08, Frozen, \$3,078.26

Bill 03/31/08, Complete, Due 04/16/08, \$3,078.26

Pay 03/14/08, Frozen, \$3,280.93

Bill 02/29/08, Complete, Due 03/18/08, \$3,280.33

2 of 2 12/03/07 - 02/19/08

Pay 02/19/08, Frozen, \$3,624.80

Bill 01/31/08, Complete, Due 02/18/08, \$3,624.80

Pay 01/16/08, Frozen, \$3,499.73

Bill 01/03/08, Complete, Due 01/22/08, \$3,499.73

Pay 12/18/07, Frozen, \$4,600.66

Bill 12/03/07, Complete, Due 12/21/07, \$4,600.66

Past 12 - 24 months

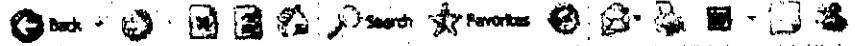
Older than 24 months

Related Links

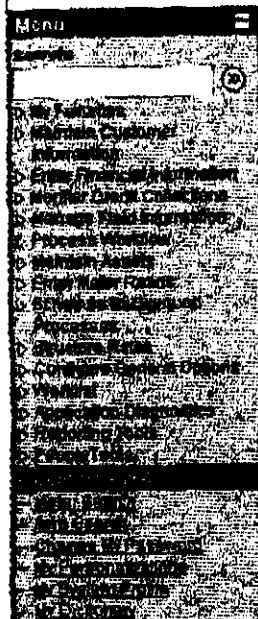
Cont. on next page

Prev. Customize Links Free Hotmail Windows Windows Marketplace Windows Media

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PeopleSoft.



Account # 9297451701 Cur Bal \$8,363.45

Customer + Circuit City Inc

Premise No Premise in context

Search Account Information Bills/Payments Person Tree Account Tree Premise Tree

Account Circuit City Inc - MAIN - Bill Cycle Manual Bill

4627 GREENWAY DR.

Next Bill: New Transactions will appear on the next Bill

E, G, W &amp; WW

Total Adj. Amt. \$0.00

Completed Bills &amp; Payments

Past 12 months

1 of 2 03/21/08 - 11/13/08

Bill 11/13/08, Complete, Due 12/01/08, \$8,363.45

Bill 11/05/08, Complete, Due 11/24/08, \$6,820.10

Pay 10/22/08, Frozen, \$5,875.26

Bill 10/06/08, Complete, Due 10/24/08, \$5,875.26

Pay 09/24/08, Frozen, \$24.60

Pay 09/24/08, Frozen, \$7,581.55

Bill 09/08/08, Complete, Due 09/26/08, \$7,606.15

Pay 08/22/08, Frozen, \$6,836.45

Bill 08/05/08, Complete, Due 08/25/08, \$6,836.45

Pay 07/16/08, Frozen, \$5,821.15

Bill 07/02/08, Complete, Due 07/21/08, \$5,821.15

Pay 06/25/08, Frozen, \$6,483.67

Bill 06/09/08, Complete, Due 06/27/08, \$6,483.67

Pay 05/16/08, Frozen, \$5,189.76

Bill 05/02/08, Complete, Due 05/20/08, \$5,189.76

Pay 04/18/08, Frozen, \$4,902.37

Bill 04/02/08, Complete, Due 04/21/08, \$4,902.37

Pay 03/21/08, Frozen, \$5,294.18

2 of 2 12/11/07 - 03/05/08

Bill 03/05/08, Complete, Due 03/24/08, \$5,294.18

Pay 02/19/08, Frozen, \$5,479.28

Bill 02/04/08, Complete, Due 02/22/08, \$5,479.28

Pay 01/25/08, Frozen, \$6,887.09

Bill 01/09/08, Complete, Due 01/28/08, \$6,887.09

Pay 12/28/07, Frozen, \$2,064.39

Bill 12/11/07, Complete, Due 12/31/07, \$2,064.39

Past 12 - 24 months

Related Links

start

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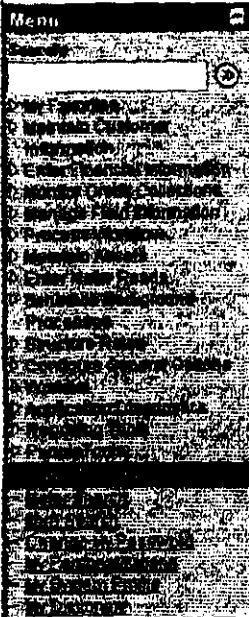
File

Edit

View



PeopleSoft.



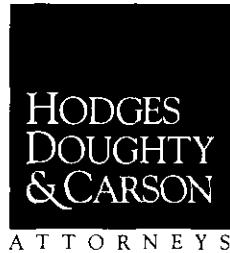
Account # 1729300000 Cur Bal \$244.72	Customer Circuit City Inc
Premise No Premise in context	
<input type="button" value="Search"/> <input type="button" value="Account Information"/> <input type="button" value="Bills / Payments"/> <input type="button" value="Descriptions"/> <input type="button" value="Account Tree"/> <input type="button" value="Practice Tree"/>	
<p><input type="checkbox"/> Account Circuit City Inc - MAIN - Bill Cycle ManualBill</p> <p><input type="checkbox"/> Next Bill: New Transactions will appear on the next Bill</p> <p><input type="checkbox"/> Total Adj. Amt. \$0.00</p> <p><input type="checkbox"/> Completed Bills &amp; Payments</p> <p><input type="checkbox"/> Past 12 months</p> <p><input type="checkbox"/> 1 of 2 02/26/08 - 11/11/08</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Bill 11/11/08, Complete, Due 12/01/08, \$244.72</li> <li><input type="checkbox"/> Bill 10/30/08, Complete, Due 11/17/08, \$122.36</li> <li><input type="checkbox"/> Pay 10/21/08, Frozen, \$122.36</li> <li><input type="checkbox"/> Bill 10/01/08, Complete, Due 10/20/08, \$122.36</li> <li><input type="checkbox"/> Pay 09/19/08, Frozen, \$122.36</li> <li><input type="checkbox"/> Bill 09/02/08, Complete, Due 09/22/08, \$122.36</li> <li><input type="checkbox"/> Pay 08/15/08, Frozen, \$122.36</li> <li><input type="checkbox"/> Bill 07/30/08, Complete, Due 08/18/08, \$122.36</li> <li><input type="checkbox"/> Pay 07/11/08, Frozen, \$122.36</li> <li><input type="checkbox"/> Bill 06/27/08, Complete, Due 07/15/08, \$122.36</li> <li><input type="checkbox"/> Pay 06/13/08, Frozen, \$122.36</li> <li><input type="checkbox"/> Bill 05/29/08, Complete, Due 06/16/08, \$122.36</li> <li><input type="checkbox"/> Pay 05/14/08, Frozen, \$122.36</li> <li><input type="checkbox"/> Bill 04/26/08, Complete, Due 05/16/08, \$122.36</li> <li><input type="checkbox"/> Pay 04/11/08, Frozen, \$122.36</li> <li><input type="checkbox"/> Bill 03/28/08, Complete, Due 04/15/08, \$122.36</li> <li><input type="checkbox"/> Pay 03/14/08, Frozen, \$122.36</li> <li><input type="checkbox"/> Bill 02/28/08, Complete, Due 03/17/08, \$122.36</li> </ul> <p><input type="checkbox"/> 2 of 2 12/14/07 - 02/15/08</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Pay 02/15/08, Frozen, \$122.36</li> <li><input type="checkbox"/> Bill 01/30/08, Complete, Due 02/18/08, \$122.36</li> <li><input type="checkbox"/> Pay 01/18/08, Frozen, \$122.36</li> <li><input type="checkbox"/> Bill 01/02/08, Complete, Due 01/22/08, \$122.36</li> <li><input type="checkbox"/> Pay 12/14/07, Frozen, \$122.36</li> </ul> <p><input type="checkbox"/> Past 12 - 24 months</p> <p><input type="checkbox"/> Older than 24 months</p>	

2936 KNOXVILLE Center Dr

(W) FIRE PROTECTION

Related Links





DALTON L. TOWNSEND  
ROY L. AARON  
DEAN B. FARMER  
DAVID N. WEDEKIND  
ALBERT J. HARB  
EDWARD G. WHITE II  
THOMAS H. DICKENSON  
J. WILLIAM COLEY  
J. MICHAEL HAYNES  
T. KENAN SMITH  
WAYNE A. KLINE  
HIRAM G. TIPTON  
B. CHASE KIBLER  
CHRISTOPHER D. HEAGERTY  
KRISTI M. DAVIS  
JOSHUA M. BALL  
JOSHUA J. BOND

ASSOCIATES  
LISA J. HALL  
KANDI R. YEAGER  
E. MICHAEL BREZINA III  
MATTHEW A. BIRDWELL  
OLIVER D. ADAMS  
WESLEY D. STONE

OF COUNSEL  
ROBERT R. CAMPBELL  
JOHN W. WHEELER  
JULIA S. HOWARD

RETIRED  
JONATHAN H. BURNETT  
DAVID E. SMITH  
DOUGLAS L. DUTTON  
WILLIAM F. ALLEY, JR.

J.H. HODGES (1896-1983)  
J.H. DOUGHTY (1903-1987)  
RICHARD L. CARSON (1912-1980)  
JOHN P. DAVIS, JR. (1923-1977)

December 2, 2008

Clerk of the Court  
United States Bankruptcy Court  
Eastern District of Virginia  
1100 East Main Street, Room 310  
Richmond, VA 23219-3515

Re: Circuit City Stores, Inc., et al.  
USBC No. 08-35653

To Whom It May Concern:

Please find enclosed Knoxville Utility Board's Supplemental Request for Adequate Assurance, Request for Additional Adequate Assurance and Objection to Debtor's Proposed Adequate Assurance for filing. I have enclosed a self-addressed, stamped envelope to return a file-stamped copy of this pleading.

Very truly yours,

**HODGES, DOUGHTY & CARSON, PLLC**

A handwritten signature in black ink that reads "Dean Farmer".

Dean B. Farmer

DBF/sb  
cc: Certificate of Service List